

From: [David G FARRER](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#)
Subject: Re: Revised Portland Harbor RAOs
Date: 02/25/2009 04:12 PM

Eric,

Would this be the appropriate place to mention community outreach to promote existing fish advisories in the harbor as part of the remedy? Is that still a concept that you think is good/feasible/worthwhile?

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>>> <Blischke.Eric@epamail.epa.gov> 2/25/2009 3:30 PM >>>

Attached is a set of revised RAOs for the PH site. I have made three changes to the RAOs sent out earlier today:

1) Changed the wording regarding the reduction of COC concentrations from: "Reduce COC concentrations to in [media of interest] to levels that are protective...." to "Reduce COC concentrations to in [media of interest] to acceptable exposure levels that are protective...." This change is consistent with language in the NCP which states for human health and carcinogens for example:

For known or suspected carcinogens, acceptable exposure levels are generally concentration levels that represent an excess upper bound lifetime cancer risk to an individual of between 10^{-4} and 10^{-6} using information on the relationship between dose and response.

2) Changed the riparian soil RAO to be consistent with the problem formulation for the baseline ecological risk assessment which has identified riparian soil as a complete exposure pathway only for the

spotted sandpiper. The RAO now reads:

Reduce riparian soil COC concentrations to acceptable exposure levels
protective of invertivorous birds at the site.

3) Made changes to the downstream migration RAO to eliminate references
to sediment and to protective levels. I believe that this is broader in scope:

To the maximum extent practicable, minimize the long-term transport of COCs in the Willamette River from the site to the Columbia River and the Multnomah Channel.

Please look these over. I would like to receive comments on these by COB, Monday, March 2, 2009.

Thanks, Eric

(See attached file: PHRAOs022509B.doc)